

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2013 APR -9 P 4:01

JOHN A. SANFILIPPO
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 13-CR-

13 -CR-58

[18 U.S.C. §§ 1001 & 1030(a)(5)]

HUA JUN ZHAO,

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about February 27, 2013, in the State and Eastern District of Wisconsin,

HUA JUN ZHAO,

the defendant, knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused and attempted to cause damage without authorization to a protected computer at the Medical College of Wisconsin.

2. The offense, if completed, would have caused over \$5,000 in loss to the Medical College during a 1-year period.

All in violation of Title 18, United States Code, Sections 1030(a)(5)(A), 1030(b), and 1030(c)(4)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. On or about March 1, 2013, in the State and Eastern District of Wisconsin,

HUA JUN ZHAO,

the defendant, did knowingly and willfully make a materially false, fictitious, and fraudulent statement concerning a matter within the jurisdiction of the executive branch of the Government of the United States.

2. The matter was an investigation by the Federal Bureau of Investigation into an alleged theft of an anti-cancer compound from a controlled environment at the Medical College of Wisconsin on or about February 22, 2013.

3. The defendant's statement to the FBI was that after being suspended from employment by the Medical College, he never had logged into the Medical College's computer server and deleted files related to the stolen compound.

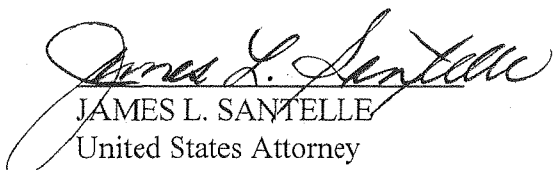
4. The defendant's statement was false in that on or about February 27, 2013, after being suspended, the defendant returned to the Medical College, gained access to the computer server, and deleted extensive files on that server related to the stolen compound.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

Date: 9 April 2013


JAMES L. SANTELLE
United States Attorney

Dated: April 9, 2013